

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

United States of America,

Plaintiff,

vs

Case No. 11-cr-201298

**Hon. Robert H. Cleland**

U.S. District Court Judge

DEAN TAGLIAVIA,

Defendant.

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**DEFENDANT TAGLIAVIA'S RESPONSE TO  
GOVERNMENT'S EXCLUDABLE DELAY MOTION**

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NOW COMES Defendant Dean Tagliavia, by and through his counsel, Burdick Law, P.C. by James W. Burdick, and in response to the government's motion to declare the time between April 16, 2013, and June 20, 2013, to be excludable delay under T. 18 USC §3161(h)(7)(B)(ii) (Dkt No. 570), concurs that the time should be considered excludable as set forth in said motion.

**BURDICK LAW, P.C.**

By:           /s/ James W. Burdick          

**JAMES W. BURDICK (P-11397)**

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**CERTIFICATE OF SERVICE**

I hereby certify that, on April 18, 2013, I electronically filed the foregoing **Defendant Dean Tagliavia's Response to Government Motion to Consolidate** with the Clerk of the Court, United States District Court for the Eastern District of Michigan, using the ECF system, which will send notification of such filing to the following:

AUSA, Eric Straus and Saima Moshin, at:

[eric.straus@usdoj.gov](mailto:eric.straus@usdoj.gov) and [saima.moshin@usdoj.gov](mailto:saima.moshin@usdoj.gov)

as well as to all other counsel of record.

Respectfully submitted,

**Burdick Law, P.C.**

/s/ James W. Burdick

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Dated: **April 18, 2013**